

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

MICHAEL LAWRENCE LOMBARDO,	:	
	:	CIVIL No. 2:24-cv-01711-KBH
Plaintiff,	:	
v.	:	
	:	Honorable Kelley Brisbon Hodge
CHRISTOPHER BRYAN LEONARD	:	
	:	
and	:	
	:	
IMS TECHNOLOGY SERVICES, INC.,	:	
	:	
Defendants.	:	

DEFENDANT IMS TECHNOLOGY SERVICES, INC.'S MOTION TO DISMISS

Defendant IMS Technology Services, Inc., through its undersigned attorneys, files this Motion to Dismiss Plaintiff's Complaint pursuant to Fed. R. Civ. P. 12(b)(6) seeking to dismiss IMS as a party, and in support of its Motion relies upon the accompanying memorandum of law, which is incorporated herein by reference.

Respectfully submitted,

GORDON REES SCULLY MANSUKHANI, LLP

/s/ Alexander Nemiroff
Alexander Nemiroff (PA ID #92250)
Three Logan Square
1717 Arch Street, Suite 610
Philadelphia, PA 19103
(267) 602-2040 (phone)
(215) 253-5017 (fax)
anemiroff@grsm.com

*Attorneys for Defendant
IMS Technology Services, Inc.*

Dated: May 28, 2024

CERTIFICATE OF SERVICE

I certify that on this 28th day of May 2024, Defendant IMS Technology Services, Inc.'s Motion to Dismiss, supporting brief, and proposed Order were electronically filed and are available for viewing and downloading from the ECF system. In addition, a copy was mailed and emailed to Plaintiff at the following address:

Michael Lawrence Lombardo
45 Laurel Trail
Monroe, New York 10950
iamthemichaellawrence@gmail.com

Dated: May 28, 2024

/s/ Alexander Nemiroff
Alexander Nemiroff (PA ID. #92250)

MEET & CONFER CERTIFICATION

I certify that on May 20, 2024, undersigned counsel spoke with Plaintiff regarding this motion to dismiss, but the efforts to meet and confer were unsuccessful and the parties were unable to reach a resolution.

Dated: May 28, 2024

/s/ Alexander Nemiroff
Alexander Nemiroff (PA ID. #92250)